



June 5, 2008

The Honorable John Paul Woodley, Jr.  
Assistant Secretary of the Army (Civil Works)  
C/O Larry Prather, HQUSACE  
Via E-mail: larry.j.prather@usace.army.mil

Subject: Phase 1 of Revisions to the “Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies” dated March 10, 1983

Dear Secretary Woodley:

On behalf of over one million members and supporters of Audubon, thank you for the opportunity to provide comments regarding recommendations for the revision of the Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies, dated March 10, 1983. The revision of the Principles and Guidelines, as directed by Congress in the Water Resources Development Act of 2007 (WRDA 2007), provides an important opportunity to advance our mutual natural resources stewardship objectives, as reflected in our Memorandum of Understanding, dated March 20, 2006, and to reflect the values and concerns of the majority of Americans.

To this end, Audubon offers the following comments:

### **I. Environmental Protection and Ecological Restoration**

The Principles and Guidelines should place environmental protection and ecological restoration on equal footing with other Corps missions of public safety and economic development, to appropriately reflect national priorities. Section 2031(a) of WRDA 2007 recognizes protecting and restoring natural systems as one of the national priorities that water resources planning policy should recognize. This also recognizes that, in the future, the Corps’ portfolio of projects is likely to increasingly include ecosystem restoration and protection.

Additionally, revisions to the Principles and Guidelines should remove the economic bias against non-structural and natural system alternatives to all Corps missions. Non-structural and natural system options to address or partially address water resources issues should be given priority consideration in alternatives development and evaluation. Protecting and restoring healthy, fully functioning ecosystems and their associated ecological services should be given the highest priority for project planning. Projects should be designed to work with and maintain the integrity of natural systems to the maximum extent practicable.

## **II. Ecosystem/Watershed Scale Planning**

The revised Principles and Guidelines should incorporate an ecosystem or watershed scale approach to all water resources planning to ensure a comprehensive evaluation of the complex interrelationships of water resources within ecosystems. The present project-by-project approach is cumbersome, and has lead to unintended adverse consequences outside of project areas. Our Nation's economy and quality of life are intrinsically intertwined with the health and sustainability of our environment and ecological systems at the watershed scale.

## **III. Inclusive, Transparent, and Efficient Process**

The Principles and Guidelines should provide for an extremely inclusive and transparent water resources planning process. To develop and maintain broad public understanding and trust, other federal agencies; state, tribal, regional, and local governments; public interest organizations; and other stakeholders should be informed and actively engaged at every stage beginning at the earliest possible point. The future success of national priority water resources planning depends on an integrated and collaborative approach, each partner contributing expertise, authorities, and strengths, without unnecessary duplication of effort.

The Principles and Guidelines should acknowledge that the associated Procedures will reflect the diversity of policy objectives and that a single set of Procedures that applies to every type of project under all circumstances may not be efficient and effective. Revisions to the Principles and Guidelines should ensure that water resources planning procedures are compatible with program and project objectives and are not unnecessarily bureaucratic, wasteful, and time consuming. Additionally, the revisions should ensure that water resources planning accounts for actual and anticipated effects of climate change and focuses resources to help ecological systems to adapt to and mitigate for these effects.

We urge you to fully embrace this important and unique opportunity to update the mission of the U. S. Army Corps of Engineers to reflect national priorities and to fully realize the potential of Corps to be a leading steward of our Nation's precious water resources.

Thank you for your consideration on this vitally important water resources issue.

Sincerely,

April H. G. Smith, Esq.  
Director, Ecosystem Restoration